

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**v.**

**KEITH LASHON BELL,  
a/k/a HOG**

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**CR. NO. 2:07-CR-169-MEF**

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**MOTION TO CONTINUE**

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Comes now appointed counsel for the Defendant, Keith Lashon Bell, and prays that this Honorable Court will continue the pre-trial conference and trial setting in this matter. As grounds for this continuance counsel would show the following:

1. Counsel was appointed to this matter on the 28th day of August 2007.
2. The pre-trial conference in this matter is set for the 21st day of September and the original trial date is set for the week of October 2, 2007.
3. Counsel has had talks with Assistant United States Attorney Christa D. Deegan in hopes of working out a plea agreement.
4. Counsel is hopeful that an agreement will be reached if this request for a continuance is granted.
5. A member of Counsels immediate family passed away this weekend and memorial services are scheduled to take place this Thursday (September 20, 2007) and Friday

(September 21, 2007) in Grand Rapids, Michigan and Counsel wishes to attend said services.

6. Counsel has prepared a waiver of speedy trial rights for the Defendant to sign and will file immediately upon receipt of Defendants signature.

**WHEREFORE PREMISES CONSIDERED**, Counsel requests that this Honorable Court continue this matter.

Respectfully submitted this the 17th day of September, 2007.

s/ Benjamin E. Schoettker \_\_\_\_\_

Benjamin E. Schoettker

Attorney for Defendant

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Bar No. ASB-7648-I72S

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Christa D. Deegan

John T. Harmon

AUSA

P.O. Box 197

Montgomery, Alabama 36101

Respectfully Submitted,

s/ Benjamin E. Schoettker \_\_\_\_\_

Benjamin E. Schoettker

Attorney for Defendant, Keith Lashon Bell